

**LOCAL BANKRUPTCY FORM 9013-3**

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

**IN RE:**

Joanne A. Rollins

**CHAPTER** 13

**CASE NO.** 1 - 5 -bk- 00071-HWV

**Debtor(s)**

1900 Capital Trust III, by U.S. Bank Trust  
National Association, not in its individual capacity  
but solely as certificate trustee

**ADVERSARY NO.**    -    -ap-             
(if applicable)

**Plaintiff(s)/Movant(s)**

**vs.**

**Nature of Proceeding:**                                 

Joanne A. Rollins

  

**Defendant(s)/Respondent(s)**

**Document #:** 97

**REQUEST TO CONTINUE HEARING/TRIAL WITH CONCURRENCE<sup>1</sup>**

This request must be filed at least twenty-four (24) hours prior to the hearing. All requests must be approved by the Court. Submitting a request is not an automatic continuance.

The undersigned hereby requests a continuance with the concurrence of the opposing party (parties). This is a first request for a continuance.<sup>2</sup>

Reason for the continuance.

Seeking continuance of 30 days for Motion for Relief hearing; for continued research and review

Contemporaneous with the filing of this request, the undersigned has served a copy of this request upon all counsel participating in this proceeding.

Dated: 9/16/2019

Michael J. Shavel

Attorney for Movant

Name: Hill and Wallack LLP

Phone Number: 215-579-7700

<sup>1</sup> No alterations or interlineations of this document are permitted.